


KATHLEEN McCAFFREY BAYNES, ESQ., PLLC

21 Everett Road Extension, Suite A-4

Albany, New York 12205

(518) 489-1098 x14 • (518) 489-3304 (fax)

kmb@kmbaynes.com • www.kmbaynes.com

 May 15, 2018

Via CM/ECF

Honorable Andrew T. Baxter
 United States Magistrate Judge
 Northern District of New York
 Federal Building and U.S. Courthouse
 P.O. Box 7396
 Syracuse, NY 13261-7396

RE: New York State Rifle & Pistol
 Ass'n, Inc. v. Beach, No. 18-cv-
 134-BKS-ATB (N.D.N.Y)

Dear Judge Baxter:

The Plaintiffs respectfully seek the Court's leave to amend their Complaint. contemporaneous with this letter, Plaintiffs have filed a motion for leave to amend, a memorandum of law and affidavit supporting the motion, an unsigned copy of the proposed amended complaint, and a "redline" showing the specific changes Plaintiffs propose to make. As noted in the motion and supporting affidavit, Defendants do not oppose Plaintiffs' request to amend the Complaint. In these circumstances, Plaintiffs do not feel the pre-motion conference ordinarily required by Local Rule 7.1(b)(2) would be useful or productive. Accordingly, we respectfully request that the motion for leave be considered and granted without a pre-motion conference.

Sincerely,
 s/ Kathleen McCaffrey Baynes
 Bar Roll No. 507154
 KATHLEEN MCCAFFREY BAYNES,
 ESQ., PLLC
 Attorney of Record
 21 Everett Road Extension, Suite A-4
 Albany, NY 12205
 (518) 489-1098
kmb@kmbaynes.com

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and I hereby certify that service will be accomplished by the CM/ECF system on all parties or their counsel.

Dated: May 15, 2018

s/ Kathleen McCaffrey Baynes
Kathleen McCaffrey Baynes
Attorney for Plaintiffs

**EFFECTIVE JUNE 1, 2018, THE MAILING AND PHYSICAL ADDRESS OF THE FIRM
WILL CHANGE TO 1826 WESTERN AVENUE, ALBANY, NEW YORK 12203.
ACCORDINGLY, PLEASE DIRECT ANY MAIL POSTED ON OR AFTER MAY 25, 2018
TO THAT ADDRESS. THANK YOU.**